

Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

“A VETERAN OWNED LAW FIRM”

OF COUNSEL:

RICHARD L. WHITT

JEFFERSON D. GRIFFITH, III

401 WESTERN LANE, SUITE E,
IRMO, SOUTH CAROLINA 29063
MAILING ADDRESS: POST OFFICE BOX 362
IRMO, SOUTH CAROLINA 29063
TELEPHONE: (803) 995-7719

April 29, 2020

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Petition of Bridgestone Americas Tire Organization, LLC for an Order Compelling
Dominion Energy South Carolina, Incorporated to Allow the Operation of a 1980 kW AC Solar
Array as Authorized by State Law; Docket No. 2020-63-E

Ms. Boyd:

Please share these Comments with the Commissioners. The South Carolina Solar Business Alliance, Inc., (“SCSBA”) appreciates this opportunity to share some brief comments on the importance of maintaining a nondiscriminatory interconnection process that engenders fair access to limited interconnection resources for the benefit of South Carolina utility customers. SCSBA's Trade Members includes solar energy developers, engineering, procurement and construction firms, contractors, professional service firms, equipment distributors, and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina. In every jurisdiction where SCSBA members engage in solar development activities, our members rely on the impartiality of the local regulatory system to provide fair and equal treatment under the law.

SCSBA has long been intimately involved in solar policy and regulatory issues in South Carolina, including the passage of South Carolina's landmark solar legislation, Act 236 of 2015, which led to the implementation of the South Carolina Generator Interconnection Procedures as approved by this Commission in Order No. 2016-191. As proponents of increased solar deployment across South Carolina, SCSBA supports and applauds Bridgestone Americas Tire Organization, LLC (“BATO's”) desire to invest in and deploy cost effective clean energy resources like solar. However, our members also rely on the fair and nondiscriminatory application of the state's interconnection procedures, and SCSBA maintains that an unequal application of the law can result in discrimination and a competitive disadvantage for those businesses that operate within the current regulatory rules as adopted by this Commission.

To that end, SCSBA is confident that this Commission will apply our state's current laws and regulations in a fair and nondiscriminatory manner, and to the extent that any changes to our interconnection procedures are required to better serve the interests of all South Carolinians, then the proper proceedings, such as Docket No. 2019-326-E, will be utilized for affecting those changes. To the extent that relief is awarded to BATO in the current proceeding, we request that such relief not impair or discriminate against solar facilities that currently reside in the interconnection queue.

Respectfully Submitted,

/s/Richard L. Whitt
Richard L. Whitt,
*As Counsel for the South Carolina
Solar Business Alliance, Inc.*

RLW/cas

cc: All parties of record in Docket 2020-63-E, *via electronic mail*